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**Alexandria, VA 22314**  
May 14, 2001

The Honorable John Dingell  
United States Congress  
Washington, DC

Subject: the dysfunctional wellhead safety valves at BP Prudhoe Bay WOA

Dear Congressman Dingell:

The BP Operators and Technicians appreciate your expressed interest in their concerns as related in Jim Carlton's April 13<sup>th</sup> Wall Street Journal feature.

The reported 30% failure of the emergency Surface Safety Valves (SSV) on G Pad during tests was characterized by BP Management as nothing more than an anomaly. Your question, "was it factual"? Actually, BP concealed the fact that the Government tested two additional Pads with a combined average failure rate of 23.3%. By extrapolation and the experience of the Operators, approximately 25% of the oil field's critical emergency shut-down SSVs were dysfunctional as Secretary Gale Norton was leaving for Prudhoe.

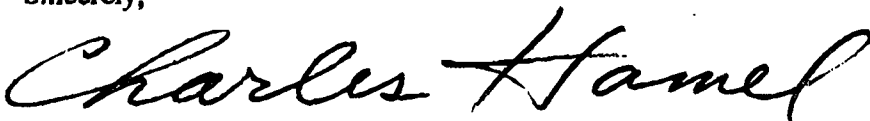
It is indisputable that beyond these wellhouse SSVs, downstream in the flow lines, the emergency Shut Down Valves (SDVs) are mostly dysfunctional, leaking, and undependable endangering their lives, the integrity of the facilities, and the environment.

The Operators and Technicians want you to know that cost driven BP philosophy calls for "run the valves to failure" without incurring maintenance expenses and oil well production down time. The Alaska Oil and Gas Conservation Commission (AOGCC) inspections are reported to be an orchestrated sham. The Operators fear a catastrophic event if remedies aren't initiated and completed.

Attached are a series of questions you may wish to ask of BP and the AOGCC for your own benefit.

A photo and functional description of the SSV may be viewed on the letter addressed to Secretary Gale Norton on the opening page of our [ANWRnews.com](http://ANWRnews.com) website

Sincerely,



Charles Hamel

On behalf of concerned Prudhoe Bay WOA Operators and Technicians

cc: The Honorable Ted Stevens  
The Honorable Frank Murkowski  
The Honorable Don Young  
The Honorable George Miller  
John Katz, Counselor to Governor Tony Knowles  
Bob Malone, President, BP Western Region

QUESTIONS: for BP North Slope Field Manager Neil McCleary

1. Does BP Management instruct, arrange for, have knowledge of, or request contractor VECO wellhead maintenance technicians to grease/ lubricate, work over a wellpad's Surface Safety Valves and/or hydraulics in advance of an AOGCC state test? Does BP supervision instruct or permit VECO technicians to shut in any wells that failed their preparations for state tests?
2. Have failed wells been returned to service without repair and then failed future tests?
3. Does BP and AOGCC confer/agree in advance on which wellpads are to be tested?
4. At any time, does BP service (lubricate, and use valve sealant) on SSVs the night before inspections, or just prior the tests?
5. Just in advance of State Inspections has BP shut-in wells to prevent them from being tested?
6. Has BP and/or AOGCC ever pass "failed" SSVs after lubrication, and the use of sealant by the well head technicians, to get it to hold pressure or function, without actual repair of the valve?
7. Does BP, with complicity of AOGCC, sometimes heat up components that fail because they are frozen, and then once thawed, pass them? What is heater's purpose on the State Tests?
8. Did BP and/or AOGCC have any knowledge of the greasing and sealing of SSVs the night before State Tests on well pads G, H, and Z pads or any other pads during the month of April 2001?
9. Did BP and/or AOGCC have any knowledge of the shutting in of wells on G,H, and Z or any other pads the night before state inspections, to avoid those SSVs being tested and thus failed in the month of April 2001?
10. BP claims that there are other redundant Emergency Shut Down Valves (SDV) downstream of these SSVs that can isolate the process fluids from harming the environment, and protecting workers in the field and in the plant. Have these SDVs ever been inspected or integrity tested by any Alaska or Federal agency? Are they integrity tested by BP? Was there a preventative maintenance program in place to regularly inspect these SDVs? Have these valves ever formally been tested for integrity by BP? Are they known to leak and fail?
11. Has State OSHA ever done an audit of the reliability of these SDVs? Has State OSHA ever done a Mechanical Integrity Audit of the facilities on the north slope?
12. BP insists that personnel in the field can manually close the valves at each well head in case of a failure of the SSVs, or unreliability of the SSVs. How many well pad operators are assigned to the wells on the WOA, and how many wells would each well pad operator have to close if all the wells were to be manually closed in an emergency? How long would it take to manually close each well with the assigned well pad operators in the WOA? (not including the day and night additional Field Operator employed since WSJ April 13<sup>th</sup> article?)
13. In the event of a fire or major spill at a Gathering Center or Alyeska Pump Station One, how long would it take to manually close all the wells and de-pressurize all the well pads and flowlines? With a failure rate of 25%, how many wells would actually be flowing pressurized oil and gas into the Gathering Centers? Do the personnel operating in the Gathering Centers depend for their lives on these valves holding and not leaking?

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